

1 [Parties and Counsel Listed on Signature Pages]
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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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7 IN RE: SOCIAL MEDIA ADOLESCENT
8 ADDICTION/PERSONAL INJURY PRODUCTS
9 LIABILITY LITIGATION

10 This Document Relates To:

11 ALL ACTIONS

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MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**STIPULATION AND ~~PROPOSED~~
ORDER REQUESTING ADDITIONAL
TIME FOR DISCUSSION AND
BRIEFING OF PARTIES' SEARCH
TERMS FOR PLAINTIFFS' DATA**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

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2 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby
3 stipulate and respectfully request that the Court extend the deadline for Personal Injury Plaintiffs and
4 Defendants to finalize negotiations over search terms to be run across the bellwether personal injury
5 plaintiffs' data sources from August 16, 2024, to August 23, 2024, with any necessary letter briefing to be
6 submitted by August 30, 2024.

7 The parties declare in support of this request:

8 1. Plaintiffs and Defendants are engaged in ongoing search term negotiations relating to
9 Defendants' previously served Requests for Production.

10 2. Plaintiffs and Defendants mutually agree that they have made good progress on negotiating
11 agreement to most of Plaintiffs' and Defendants' proposed terms and that they would benefit from more
12 time to continue their conferrals and attempt to narrow disputes regarding a small number of remaining
13 search terms.

14 3. Plaintiffs and Defendants believe that an extension until August 23, 2024, to finalize
15 negotiations will afford adequate time for such negotiations.

16 4. Plaintiffs agree to start running agreed-upon terms and continue making rolling productions
17 of documents while the parties continue negotiations on the other terms.

18 5. Extending this deadline will not affect any other deadline affixed by the Court.

19 6. This is the first request to extend this deadline.

20 THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully
21 request that the Court extend the deadline for Plaintiffs and Defendants to finalize search term negotiations
22 to August 23 with any necessary letter briefing to be submitted by August 30.

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2 Respectfully submitted,

3 Dated: August 16, 2024

/s/ Lexi J. Hazam

4
5 LEXI J. HAZAM
6 Lieff Cabraser Heimann & Bernstein, LLP
7 275 Battery Street, 29th Floor
8 San Francisco, CA 94111-3339
9 Telephone: 415-956-1000
10 lhazam@lchb.com

11
12 PREVIN WARREN
13 Motley Rice LLC
14 401 9th Street NW Suite 630
15 Washington DC 20004
16 Telephone: 202-386-9610
17 pwarren@motleyrice.com

18
19 *Co-Lead Counsel*

20
21 CHRISTOPHER A. SEEGER
22 Seeger Weiss, LLP
23 55 Challenger Road, 6th floor
24 Ridgefield Park, NJ 07660
25 Telephone: 973-639-9100
26 Facsimile: 973-679-8656
27 cseeger@seegerweiss.com

28
18 *Counsel to Co-Lead Counsel and Settlement
19 Counsel*

20
21 JENNIE LEE ANDERSON
22 Andrus Anderson, LLP
23 155 Montgomery Street, Suite 900
24 San Francisco, CA 94104
25 Telephone: 415-986-1400
26 jennie@andrusanderson.com

27
28 *Liaison Counsel*

29
30 JOSEPH G. VANZANDT
31 Beasley Allen Crow Methvin Portis & Miles, P.C.
32 234 Commerce Street
33 Montgomery, AL 36103
34 Telephone: 334-269-2343

1 joseph.vanzandt@beasleyallen.com

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3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
EMILY C. JEFFCOTT
Morgan & Morgan
220 W. Garden Street, 9th Floor
Pensacola, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN
GLENN DRAPER
Social Media Victims Law Center
600 1st Avenue, Suite 102-PMB 2383
Seattle, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

JAMES J. BILSBORROW
Weitz & Luxenberg, PC
700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

JAYNE CONROY
Simmons Hanly Conroy, LLC
112 Madison Ave, 7th Floor
New York, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
Gibbs Law Group, LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

ALEXANDRA WALSH
Walsh Law
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014

1 awalsh@alexwalshlaw.com

2 MICHAEL M. WEINKOWITZ
3 Levin Sedran & Berman, LLP
4 510 Walnut Street, Suite 500
5 Philadelphia, PA 19106
6 Telephone: 215-592-1500
7 mweinkowitz@lfsbalw.com

8 *Plaintiffs' Steering Committee Leadership*

9 RON AUSTIN
10 Ron Austin Law
11 400 Manhattan Blvd.
12 Harvey, LA 70058
13 Telephone: (504) 227-8100
14 raustin@ronaustinlaw.com

15 PAIGE BOLDT
16 Watts Guerra LLP
17 4 Dominion Drive, Bldg. 3, Suite 100
18 San Antonio, TX 78257
19 Telephone: 210-448-0500
20 PBoldt@WattsGuerra.com

21 THOMAS P. CARTMELL
22 Wagstaff & Cartmell LLP
23 4740 Grand Avenue, Suite 300
24 Kansas City, MO 64112
25 Telephone: 816-701-1100
26 tcartmell@wcllp.com

27 SARAH EMERY
28 RONALD E. JOHNSON, JR.
19 Hendy Johnson Vaughn Emery PSC
20 600 West Main Street, Suite 100
21 Louisville, KY 40202
22 Telephone: 859-600-6725
23 semery@justicestartshere.com
24 rjohnson@justicestartshere.com

25 CARRIE GOLDBERG
26 C.A. Goldberg, PLLC
27 16 Court St.
28 Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

1 SIN-TING MARY LIU
2 Aylstock Witkin Kreis & Overholtz, PLLC
3 17 East Main Street, Suite 200
4 Pensacola, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

5 JAMES MARSH
6 Marsh Law Firm PLLC
7 31 Hudson Yards, 11th floor
8 New York, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

9 JOSEPH E. MELTZER
10 MELISSA YEATES
11 Kessler Topaz Meltzer & Check LLP
12 280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706
jmeltzer@ktmc.com
myeates@ktmc.com

13 HILLARY NAPPI
14 Hach & Rose LLP
15 112 Madison Avenue, 10th Floor
16 New York, New York 10016
17 Telephone: 212-213-8311
hnappi@hrsclaw.com

18 EMMIE PAULOS
19 Levin Papantonio Rafferty
20 316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

21 RUTH THI RIZKALLA
22 The Carlson Law Firm, PC
1500 Rosecrans Ave., Ste. 500
23 Manhattan Beach, CA 90266
24 Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

25 ROLAND TELLIS
26 DAVID FERNANDES

1 Baron & Budd, P.C.
2 15910 Ventura Boulevard, Suite 1600
3 Encino, CA 91436
4 Telephone: 818-839-2333
Facsimile: (818) 986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com

5 DIANDRA "FU" DEBROSSE ZIMMERMANN
6 Dicello Levitt
7 505 20th St North
Suite 1500
8 Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicelolevitt.com

10 *Attorneys for Individual Plaintiffs*

13 COVINGTON & BURLING LLP
14 By: /s/ Gregory L. Halperin
15 Gregory L. Halperin, *pro hac vice*
16 COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
17 New York, NY 10018-1405
Telephone: (212) 841-1166
18 Facsimile: (212) 841-1010
Email: ghalperin@cov.com

20 Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
21 1999 Avenue of the Stars
Los Angeles, CA 90067
22 Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
23 Email: asimonsen@cov.com

24 Phyllis A. Jones, *pro hac vice*
25 Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
26 One City Center
850 Tenth Street, NW
27 Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000

1 Facsimile: + 1 (202) 662-6291
2 Email: pajones@cov.com

3 *Attorney for Defendants Meta Platforms, Inc.*
4 *f/k/a Facebook, Inc.; Facebook Holdings,*
5 *LLC; Facebook Operations, LLC; Facebook*
6 *Payments, Inc.; Facebook Technologies, LLC;*
7 *Instagram, LLC; Siculus, Inc.; and Mark Elliot*
8 *Zuckerberg*

9
10 FAEGRE DRINKER LLP
11 By: /s/ Andrea Roberts Pierson
12 Andrea Roberts Pierson, *pro hac vice*
13 Amy Fiterman, *pro hac vice*
14 FAEGRE DRINKER LLP
15 300 N. Meridian Street, Suite 2500
16 Indianapolis, IN 46204
17 Telephone: + 1 (317) 237-0300
18 Facsimile: + 1 (317) 237-1000
19 Email: andrea.pierson@faegredrinker.com
20 Email: amy.fiterman @faegredrinker.com

21 GEOFFREY DRAKE, *pro hac vice*
22 David Mattern, *pro hac vice*
23 KING & SPALDING LLP
24 1180 Peachtree Street, NE, Suite 1600
25 Atlanta, GA 30309
26 Tel.: 404-572-4600
27 Email: gdrake@kslaw.com
28 Email: dmattern@kslaw.com

19
20 *Attorneys for Defendants TikTok Inc. and ByteDance*
21 *Inc.*

22 MUNGER, TOLLES & OLSEN LLP
23 By: /s/ Jonathan H. Blavin
24 Jonathan H. Blavin, SBN 230269
25 MUNGER, TOLLES & OLSON LLP
26 560 Mission Street, 27th Floor
27 San Francisco, CA 94105-3089
28 Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)

1 Laura M. Lopez, (SBN 313450)
2 Ariel T. Teshuva (SBN 324238)
3 MUNGER, TOLLES & OLSON LLP
4 350 South Grand Avenue, 50th Floor
5 Los Angeles, CA 90071-3426
6 Telephone: (213) 683-9100
7 Facsimile: (213) 687-3702
8 Email: rose.ehler@mto.com
9 Email: victoria.degyareva@mto.com
10 Email: Ariel.Teshuva@mto.com

11 Lauren A. Bell (*pro hac vice forthcoming*)
12 MUNGER, TOLLES & OLSON LLP
13 601 Massachusetts Ave., NW St.,
14 Suite 500 E
15 Washington, D.C. 20001-5369
16 Telephone: (202) 220-1100
17 Facsimile: (202) 220-2300
18 Email: lauren.bell@mto.com

19
20 *Attorneys for Defendant Snap Inc.*

21 SKADDEN, ARPS, SLATE, MEAGHER &
22 FLOM LLP
23 By: /s/ Jessica Davidson
24 Jessica Davidson, pro hac vice
25 SKADDEN, ARPS, SLATE, MEAGHER &
26 FLOM LLP
27 One Manhattan West
28 New York, New York 10001
Phone: (212) 735-3222
Fax: (917) 777-3222
jessica.davidson@skadden.com

Nina R. Rose, pro hac vice
SKADDEN, ARPS, SLATE, MEAGHER &

1 FLOM LLP
2 1440 New York Avenue, N.W.
3 Washington, D.C. 20005
4 Telephone: (202) 371-7000
Facsimile: (202) 661-0525
nina.rose@skadden.com

5 *Attorneys for Defendant Snap Inc.*

6 WILSON SONSINI GOODRICH & ROSATI
7 Professional Corporation
8 By: /s/ Brian M. Willen
Brian M. Willen
9 WILSON SONSINI GOODRICH & ROSATI
10 1301 Avenue of the Americas, 40th Floor
New York, New York 10019
11 Telephone: (212) 999-5800
Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

12 Christopher Chiou
13 WILSON SONSINI GOODRICH & ROSATI
14 633 West Fifth Street
Los Angeles, CA 90071-2048
15 Telephone: (323) 210-2900
Facsimile: (866) 974-7329
Email: cchiou@wsgr.com

17 *Attorneys for Defendants YouTube, LLC, Google LLC*

18 WILLIAMS & CONNOLLY LLP
19 By: /s/ Joseph G. Petrosinelli
Joseph G. Petrosinelli
jpetrosinelli@wc.com
Ashley W. Hardin
ahardin@wc.com
680 Maine Avenue, SW
Washington, DC 20024
Telephone.: 202-434-5000
Fax: 202-434-5029

25 *Attorneys for Defendants YouTube, LLC, Google LLC*

26 MORGAN LEWIS & BOCKIUS, LLP

28 By: /s/ Brian Ercole

1 Brian Ercole (pro hac vice)
2 brian.ercole@morganlewis.com
3 Morgan Lewis & Bockius, LLP
4 600 Brickell Avenue, Suite 1600
5 Miami, FL 33131-3075
6 Tel.: 305.415.3416
7
8

5 Yardena R. Zwang-Weissman (SBN 247111)
6 yardena.zwang-weissman@morganlewis.com
7 Morgan Lewis & Bockius, LLP
8 300 South Grand Avenue, 22nd Floor
9 Los Angeles, CA 90071-3132
10 Tel.: 213.612.7238
11
12

13 *Attorneys for Defendants YouTube, LLC, Google LLC*
14
15

16 **IT IS SO ORDERED** that the foregoing Stipulation is approved.
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18 DATED: August 16, 2024
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21 HONORABLE PETER H. KANG
22 United States Magistrate Judge
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1 **ATTESTATION**
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3 I, Gregory L. Halperin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence
4 to the filing of this document has been obtained from each signatory hereto.
5

6 Dated: August 16, 2024
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8 By: /s/ Gregory L. Halperin
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